

IOWA ETHICS AND CAMPAIGN DISCLOSURE BOARD

An Independent Agency of the Executive Branch

W. CHARLES SMITHSON
Executive Director
& Legal Counsel

510 East 12th, Suite 1A
Des Moines, Iowa 50319
Telephone 515-281-4028/General Fax 515-281-3701
Report Fax Line 515-281-4073
www.iowa.gov/ethics

BOARD MEMBERS:
James Albert, Chair
Janet Carl, Vice Chair
Gerald Sullivan
Betsy Roe
John Walsh
Patricia Harper

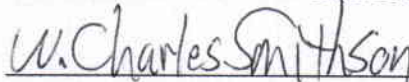
ROMNEY FOR PRESIDENT, INC.,)	
A Federal Committee,)	ORDER to RESCIND
AND)	CIVIL PENALTY ASSESSMENT
KATHRYN BIBER CHEN,)	
<u>Counsel to the Committee.</u>)	

The Romney for President, Inc. committee was previously assessed three \$25 civil penalties for allegedly failing to timely file a Verified Statement of Registration (VSR) due to three contributions being made to The Commonwealth PAC in December of 2007.

The evidence now demonstrates that the transactions were not "contributions" but rather payments for equipment and furniture. Pursuant to Board policy, such transactions are not "contributions" requiring the filing of a VSR. The Board does note that The Commonwealth PAC did not state on its campaign disclosure report that the transactions were for purchases as opposed to monetary contributions.

As these were purchases of equipment and furniture at fair market value, the Board does not consider them to be "contributions" that trigger the VSR requirement. Therefore, on April 21, 2008, the Board hereby rescinds the previously issued Civil Penalty Assessment Order and no penalties are due or owing.

ON BEHALF OF THE BOARD:



W. Charles Smithson, Director & Counsel